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**From:** Lisa Rector [lrector@nescaum.org]  
**Sent:** 9/9/2020 9:20:09 PM  
**To:** Sanchez, Rafael [Sanchez.Rafael@epa.gov]  
**Subject:** Maine Energy Systems Test Report

Rafael, we have been reviewing test reports and have questions about the implementation of ASTM 2618 Test Method use with pellet boilers. We found test reports that state that the unit did not operate in Category 1 and used the "Stopped Fuel Combustion" as a basis for allowing the use of two Category 2 test runs, in lieu of a Category 1 test run. They invoked section 12.2.13 as a basis for that action. However, per the method, this section only applies to cordwood appliances. Section 12.3 is the section that applies to automatically fueled appliances – aka pellet or chip boilers. I do not see any allowances for stopped fuel combustion to end a test run, nor do I see the ability to conduct two Category 2 tests in lieu of a Category 1 test run. I checked the Applicability Determination Index regarding this activity and found nothing. Can you please provide me the information that EPA developed that allows this deviation from the test method?

Thanks!

Lisa Rector



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